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February 7, 2020

**VIA ECF**

The Honorable Robert M. Levy, U.S.M.J.  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Mora, et al. v. Bareburger LLC, et al.*  
Case No. 16-cv-04373

Dear Judge Levy,

We are counsel to Plaintiff in the above-referenced matter. We write jointly with counsel for Defendants pursuant to the Court's February 3, 2020 Order to provide the Court with a status report. The parties held a mediation with Mr. Raymond Nardo on January 13, 2020. Unfortunately, the parties were unable to reach a settlement at the time.

Plaintiffs now intend to seek leave to file a motion to enforce an executed memorandum of agreement, dated April 19, 2018, from a prior mediation in this matter. The parties have agreed to the following briefing schedule:

Plaintiffs' Motion:	February 24, 2020
Defendants' Opposition:	March 16, 2020
Plaintiffs' Reply:	April 6, 2020

In the interim, pending the outcome of the motion to enforce, the parties jointly request the discovery be held in abeyance for this matter as this Court's determination on Plaintiffs' motion could render further fact discovery moot.

Finally, the parties jointly request that the confidentiality agreement previously entered into by the parties be submitted in *in camera* for the contemplated motion.

We thank Your Honor for considering this matter.

Respectfully submitted,

/s/ C.K. Lee  
C.K. Lee, Esq.

cc: all parties via ECF